PACIFIC GAS AND ELECTRIC COMPANY

PG=E 77 BEALE STREET . SAN FRANCISCO, CALIFORNIA 94106 . (415) 781-4211

NOLAN H. DAINES
VICE PRESIDENT
PLANNING AND RESEARCH

November 17, 1980

HAND DELIVERED

Mr. Paul De Falco Regional Administrator, Region IX Environmental Protection Agency 215 Fremont Street San Francisco, California 94105

Dear Mr. De Falco:

Enclosed are PGandE's Part A "Hazardous Waste Facility Permit Application" Forms 1 and 3 of the Consolidated Permits Program, in compliance with the final regulations promulgated by EPA on May 19, 1980 and July 16, 1980, pursuant to Sections 3001-3006 and 3010 of the Resource Conservation and Recovery Act (RCRA).

The facilities for which these forms are being filed include:

<u>Facilities</u>	EP	A 1.D. Number
Hunters Point Power Plant	C	AT 080011570
Morro Bay Power Plant	C	AT 080011646
Moss Landing Power Plant	· C	AT 080011653
Oakland Power Plant		AT 080011679
Contra Costa Power Plant	C	AT 080011489
Pittsburg Power Plant	C	AT 080011695
Potrero Power Plant	C	AT 080011703
Diablo Canyon Power Plant	C	AD 077966349
Humboldt Bay Power Plant	C	AT 080011562
Topock Compressor Station	- C	AT 080011729
Mountain View Land Fill Gas	C	AT 080011661
Recovery Plant		į.

Based on our review of the other facilities for which we filed our notification forms with EPA on August 18, 1980, we have determined that we are not required to file Part A application forms for these other facilities. Our reasons for not filing Forms 1 and 3 for each such facility are as follows:

Geysers Power Plant EPA I.D. No. CAT 080011521

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(1) Data collected on The Geysers solid waste samples show that the solid waste at The Geysers is not toxic according to the provisions of 40 CFR 261.24. These data were collected at EPA's request by the Acurex Corporation (Mountain View, CA). (2) There are no other wastes at The Geysers that would be considered hazardous according to the provisions of 40 CFR 261.24.

Sherman Island Collection Tank EPA I.D. No.
CAT 080011711

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Data from our laboratory analysis of samples of gas dehydrator condensate at Sherman Island show that the solid waste is not toxic, according to the provisions of 40 CFR 261.24.

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Facility	EPA I.D. Number
Kettleman Compressor Station	CAT 080011640
Mc Donald Island Underground Storage Facility	CAT 080011638
Hinkley Compressor Station	CAT 080011547
Decoto Pipe Wrapping Plant	CAT 080011497
(Union City)	
Materials Shops (Emeryville)	CAT 080011620

A review of the solid wastes generated at these facilities shows that they are not hazardous according to the provisions of 40 CFR 261.24.

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Facility	EPA	I.D. Number
Martinez Power Plant Avon Power Plant	CA	T 080011612 T 080011554
Oleum Power Plant Kern Power Plant		T 080011687 T 080011596
General Construction Oakland	CA	T 080011513
Service Center General Construction Davis	CA	D 047123773
Service Center Gas Meter Repair Plant, Fremont		T 080011505
Helms Pumped Storage Project (Construction)	CA	T 080011539
Kerckhoff 2 Power House	CA	T 080011588
(Construction) Various Garages handling	•	

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Spent Solvents.

The above facilities generate hazardous wastes which occasionally could exceed a total of 1,000 Kg in a calendar month. However, none of said facilities stores such waste longer than 90 days. Each of the above facilities has established the following operating conditions to comply with all applicable RCRA regulations as set forth in 40 CFR Part 262:

- (1) A manifest will be prepared for transportation of all hazardous wastes for off-site disposal from each facility;
- All shipments of hazardous waste off-site will be packaged, labeled and marked in accordance with 40 CFR 262.30-2;
- (3) All hazardous wastes will be shipped off-site in 90 days or less from the date of generation;
- (4) All hazardous wastes will be placed in containers which meet the standards set forth in 40 CFR 262.34(a)(2)-(4);
- (5) Each facility has prepared a preparedness and prevention plan, including fire extinguishers and no-smoking areas.
- (6) Each facility has prepared a contingency plan and emergency procedures for dealing with a spill, fire, unplanned sudden or non-sudden release of hazardous waste to air, soil or surface water;
- (7) Each facility has established a personnel training program, including classroom instruction for employees working with hazardous wastes; and
- (8) Each facility will maintain the necessary records and will submit annual reports.

Various Facilities Handling Mercury Vapor Luminaires

Mercury vapor luminaires are not wastes because they are sold for reuse according to the provisions of 40 CFR 261.24.

Various Facilities Handling Treated Poles

<u>Various Hydro Headquarters Handling</u> <u>Pressure Treated Lumber for Flumes</u>

Studies by Koppers Company Inc., Forest Products Group, (Pittsburgh, PA.), which have been furnished to PGandE indicate that used treated poles and used pressure-treated lumber for flumes (treated in a similar manner as poles) is not a hazardous waste according to the provisions of 40 CFR 261.24.

As indicated on the forms, all inquires regarding any of the facilities for which Part A application forms are filed should be addressed to:

Mr. H. M. Howe Chief Siting Engineer 77 Beale Street San Francisco, California 94106 Telephone (415) 781-4211, Extension 2733

If you have any questions, please feel free to contact Mr. Howe at 781-4211, extension 2733 at your convenience.

Sincerely,

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ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

C11000011638

PESE HCDOWALD ISLAND UNDERGRAD STORAGE

P.O. BOX 250

CA 94509

INSTALLATION ADDRESS

MC DOWALD ISLAND SAN JOACHIN COUNTY

CA

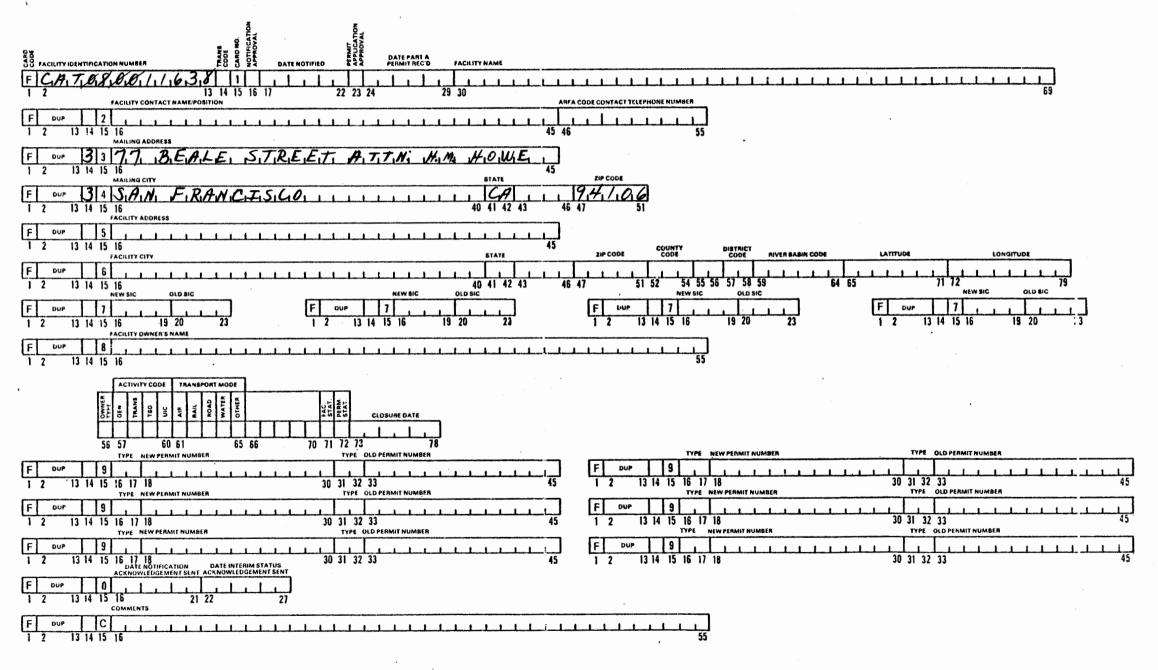
EPA Form 8700-12B (4-80)

11/07/80



ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE DATA MANAGEMENT SYSTEM

FACILITY INVENTORY MAINTENANCE FORM



	SEPA NO					ISTRUCTIONS: If you received a preprinted	
	INSTALLA- TION'S EPA I.D. NO. I. NAME OF IN- I. STALLATION				label, affix it in the space at left. If any information on the label is incorrect, draw through it and supply the correct inform in the appropriate section below. If the I complete and correct, leave Items I, II, a below blank. If you did not receive a precipility.	a line mation abel is and III	
	INSTALLA- TION II. MAILING ADDRESS	PLEASE P	LACE LABEL IN THIS	SPACE	label, complete all items. "Installation" m single site where hazardous waste is gene treated, stored and/or disposed of, or a porter's principal place of business, Please to the INSTRUCTIONS FOR FILING NO	eans a erated, trans- e refer	
	IIL OF INSTAL- LATION				CATION before completing this form information requested herein is required in (Section 3010 of the Resource Conservation Recovery Act).	by law	
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A D	B. TYPE OF OWNER (enter the appropriate lett	er into box) VI. 1	A. GENERATION		nter "X" in the appropriate box(es/) TRANSPORTATION (complete item VII)		
	F - FEDERAL M = NON-FEDERAL	М	X C. TREAT/STORE/DIS	***	UNDERGROUND INJECTION		
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WIII. FIRST OR SUBSEQUENT NOTIFICATION Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent of this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below. See also generic report on Waste Transportation Vehicles C. INSTALLATION'S EP						cation.	
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	X A. FIRST NOTI		B. SUBSEQUENT NOTIFE				
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hospitals, medical and research l	aboratories your installati	ion handles. Use add	itional sheets if necess	Bry.		
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X. CERTIFICATION						
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.						
SIGNATURE		NAME & OFFICIA	L TITLE (type or prin	it)	DATE SIGNED	
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Vice President - Planning & Research 8-18-80				I Ω_1Ω_Ω∩		

EPA Form 8700-12 (6-80) REVERSE